

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

JOHN ANTHONY CASTRO )  
12 Park Place, Mansfield, TX 76063 )  
 )  
 Plaintiff, ) Case No. 2:23-cv-00598  
 v. ) The Honorable Irene C. Burger  
 )  
 SECRETARY OF STATE ANDREW )  
 WARNER and DONALD JOHN TRUMP, )  
 )  
 Defendants. )

**AFFIDAVIT OF CAMPAIGN EXPENSES AND MEDIA COVERAGE**

I, John Anthony Castro, declare as follows:

1. I am the plaintiff in the present case, a U.S. citizen, and an FEC-registered Republican primary presidential candidate (Candidate FEC ID Number P40007320) for the 2024 Presidential Election.
2. I am a ballot-placed Republican Primary Presidential candidate in Nevada and New Hampshire. Arizona law confirms I will be on the ballot once I file on Monday, November 13, 2023. I intend to be ballot-placed in this state and will be the first time file as I have been in other states.
3. I have also incurred expenses associated with campaigning in this state, launched my own online show called the Truth Addict, and have digitally targeted voters in this state. As such, I will maintain “standing” throughout the course of this litigation.
4. I intend to pay a nominal fee to appear on the ballots of Montana (only \$4000), West Virginia (only \$2500), Delaware (only \$12,000), and Kansas (only \$4000).

5. This is a portion of the unpaid *earned* media coverage my campaign activities have received to-date:

- a. Associated Press: <https://apnews.com/article/new-hampshire-presidential-primary-2024-5bd66ceac3df40f3b0ec7676422f40bc>
- b. Reuters: <https://www.reuters.com/world/us/us-supreme-court-rebuffs-long-shot-candidates-bid-disqualify-trump-2024-2023-10-02/>
- c. Washington Post:  
<https://www.washingtonpost.com/politics/2023/11/08/minnesota-supreme-court-2024-ballot-trump/>
- d. Boston Globe: <https://www.bostonglobe.com/2023/10/30/metro/judge-dismisses-lawsuit-that-sought-block-trump-nh-ballot/>
- e. NBC News: <https://www.nbcnews.com/politics/donald-trump/live-blog/live-updates-trump-indictment-classified-documents-rcna88494>
- f. NBC News: <https://www.nbcnews.com/politics/2024-election/big-names-perennial-candidates-mix-new-hampshires-presidential-filing-rcna119994>
- g. CNN: <https://www.cnn.com/2023/10/02/politics/donald-trump-fourteenth-amendment-ballot-case-supreme-court/index.html>
- h. CNN: [https://edition.cnn.com/politics/live-news/trump-fraud-trial-new-york-10-02-23/h\\_d677487e65da843f8d1cc988015786cf](https://edition.cnn.com/politics/live-news/trump-fraud-trial-new-york-10-02-23/h_d677487e65da843f8d1cc988015786cf)
- i. Fox News: <https://www.foxnews.com/politics/push-block-trump-new-hampshire-ballot-received-coldly-state-gop-leaders>

- j. ABC News: <https://abcnews.go.com/Politics/group-sues-block-trump-2024-ballot-citing-14th/story?id=102964534>
- k. ABC News: <https://abcnews.go.com/Politics/wireStory/groups-seek-constitutions-insurrection-clause-block-trump-2024-102823096>
- l. ABC News: <https://abcnews.go.com/Politics/wireStory/filing-period-new-hampshire-presidential-primary-opens-103883184>
- m. New York Times: <https://www.nytimes.com/2023/08/30/us/politics/trump-14th-amendment.html>
- n. New York Times: <https://www.nytimes.com/2023/09/06/us/politics/trump-colorado-lawsuit-14-amendment.html>
- o. New York Times: <https://www.nytimes.com/2023/09/18/us/politics/trump-california-ballot.html>
- p. PBS: <https://www.pbs.org/newshour/politics/liberal-groups-seek-to-use-the-14th-amendment-to-block-trump-from-2024-ballots>
- q. Politico: <https://www.politico.com/news/2023/09/01/fourteenth-amendment-insurrection-clause-trump-00113790>
- r. Politico: <https://www.politico.com/newsletters/politico-nightly/2023/09/07/the-battle-thats-tearing-the-texas-gop-apart-00114616>
- s. The Hill: <https://thehill.com/homenews/ap/ap-politics/ap-filing-period-for-new-hampshire-presidential-primary-opens/>

- t. Newsweek: <https://www.newsweek.com/new-york-may-take-donald-trump-off-ballot-1842795>
- u. Newsweek: <https://www.newsweek.com/republican-threatens-trump-legal-hell-that-could-kick-him-off-ballot-1824471>
- v. Newsweek: <https://www.newsweek.com/republican-warns-trump-removed-ballot-john-anthony-castro-1829913>
- w. Newsweek: <https://www.newsweek.com/donald-trump-gets-good-news-supreme-court-1831419>
- x. Newsweek: <https://www.newsweek.com/supreme-court-decide-whether-kick-trump-off-ballot-1824577>
- y. Newsweek: <https://www.newsweek.com/trump-challenger-has-backup-plan-if-supreme-court-wont-kick-him-off-ballot-1829821>
- z. Newsweek: <https://www.newsweek.com/trump-tries-silence-member-his-inner-circle-colorado-ballot-case-1837968>
- aa. Newsweek: <https://www.newsweek.com/donald-trump-ballot-access-legal-challenge-republican-claims-1830624>
- bb. Newsweek: <https://www.newsweek.com/donald-trump-14th-amendment-taint-jury-pool-1825246>
- cc. Newsweek: <https://www.newsweek.com/full-list-states-trying-kick-trump-off-ballot-where-cases-stand-1837398>

dd. Newsweek: <https://www.newsweek.com/donald-trump-14th-amendment-jan6-2024-election-1824937>

ee. Vox: <https://www.vox.com/politics/23880607/trump-14th-amendment-lawsuits-federalist-society>

ff. New York Post: <https://nypost.com/2023/10/02/supreme-court-declines-to-hear-bid-to-disqualify-trump-from-2024-election/>

gg. Washington Times: <https://www.washingtontimes.com/news/2023/sep/5/john-anthony-castro-write-gop-presidential-candidacy/>

hh. Washington Times: <https://www.washingtontimes.com/news/2023/aug/31/liberal-groups-seek-to-use-constitutions-insurrect/>

ii. Washington Times: <https://www.washingtontimes.com/news/2023/oct/11/new-hampshires-presidential-primary-filing-period/>

jj. American Military News: <https://americanmilitarynews.com/2023/10/supreme-court-rejects-case-to-disqualify-trump-in-2024-presidential-race/>

kk. The New York Sun: <https://www.nysun.com/article/effort-to-disqualify-trump-will-soon-get-court-hearing-as-adversary-seeks-to-make-him-go-begging-to-supreme-court>

ll. The Arizona Republic:  
<https://www.azcentral.com/story/news/politics/arizona/2023/10/06/arizona-law-could-guarantee-trump-on-2024-ballot-if-qualified/71077077007/>

mm. ABA Law Journal: <https://www.abajournal.com/news/article/candidate-with-2-law-degrees-files-suits-to-keep-trump-off-the-ballot-a-different-challenge-is-tossed>

nn. CBC (Candada): <https://www.cbc.ca/news/world/trump-14th-amendment-challenges-1.7012321>

oo. Portland Press Herald: <https://www.pressherald.com/2023/09/07/texas-republican-files-suit-in-effort-to-keep-trump-off-maine-s-presidential-ballot/>

pp. The Oklahoman:

<https://www.oklahoman.com/story/news/politics/government/2023/10/12/donald-trump-oklahoma-disqualification-lawsuit-dismissed/71147982007/>

qq. Pennsylvania Capital Star: <https://www.penncapital-star.com/campaigns-elections/trump-can-run-in-nh-primary-despite-jan-6-involvement-ag-and-secretary-of-state-say/>

rr. Ballot Access News: <https://ballot-access.org/2023/10/12/john-anthony-castro-dismisses-his-idaho-lawsuit-on-trump-ballot-access/>

ss. Ballot Access News: <https://ballot-access.org/2023/10/12/john-anthony-castro-files-brief-in-eleventh-circuit-in-florida-trump-ballot-access-case/>

tt. The Providence Journal:

<https://www.providencejournal.com/story/news/politics/2023/10/28/trump-battles-lawsuit-to-keep-him-off-rhode-island-presidential-ballot/71362011007/>

uu. Las Vegas Sun: <https://lasvegassun.com/news/2023/oct/10/trump-to-participate-in-nevada-gop-caucus-bypass-p/>

vv. Fox News 13 Utah: <https://www.fox13now.com/news/local-news/lawsuit-seeks-to-keep-trump-off-the-ballot-in-utah>

ww. KOAT: <https://www.koat.com/article/federal-lawsuit-remove-donald-trump-new-mexico-ballots/45102809>

xx. KGET: <https://www.kget.com/news/politics/ap-filing-period-for-new-hampshire-presidential-primary-opens/>

yy. WBOY: <https://www.wboy.com/news/west-virginia/west-virginia-politics/wvgop-wants-to-intervene-in-effort-to-remove-trump-from-ballot/amp/>

zz. WTRF: <https://www.wtrf.com/top-stories/capito-calls-lawsuit-to-keep-trump-off-west-virginia-ballot-ridiculous-and-says-its-bound-to-lose-in-court/amp/>

aaa. WMUR: <https://www.wmur.com/amp/article/presidential-candidate-from-texas-sues-to-keep-trump-off-nh-ballot/45601317>

bbb. WMUR: <https://www.wmur.com/amp/article/new-hampshire-donald-trump-ballot-lawsuit-dismiss/45682757>

ccc. KOCO ABC News 5: <https://www.koco.com/amp/article/oklahoma-republican-party-lawyers-up-trump-presidential-ballot/45273414>

ddd. Bangor Daily News:  
<https://www.bangordailynews.com/2023/09/07/politics/john-anthony-castro-trump-ballot-challenge/>

eee. WV News: [https://www.wvnews.com/news/wvnews/republican-candidate-files-lawsuit-to-remove-donald-trump-from-presidential-ballot-in-west-virginia-and/article\\_739765f8-fe36-5ea2-bc15-bb05857abb77.html](https://www.wvnews.com/news/wvnews/republican-candidate-files-lawsuit-to-remove-donald-trump-from-presidential-ballot-in-west-virginia-and/article_739765f8-fe36-5ea2-bc15-bb05857abb77.html)

fff. Nebraska Examiner: <https://nebraskaexaminer.com/2023/09/13/trump-can-run-in-nh-primary-despite-jan-6-involvement-ag-and-secretary-of-state-say/>

ggg. The State: <https://www.thestate.com/news/politics-government/article279511574.html>

hhh. Scripps News: <https://scrippsnews.com/stories/new-mexico-lawsuit-joins-other-bids-to-keep-trump-off-state-ballots/>

iii. 19FortyFive: <https://www.19fortyfive.com/2023/10/he-could-be-disqualified-donald-trump-has-a-14th-amendment-problem/>

jjj. 19FortyFive: <https://www.19fortyfive.com/2023/10/not-disqualified-yet-donald-trump-was-just-saved-by-the-supreme-court/>

kkk. 19FortyFive: <https://www.19fortyfive.com/2023/09/justices-to-decide-whether-to-take-the-trump-14th-amendment-case/>

6. I have personal first-hand knowledge of all factual matters set forth in this document, and, if called upon to testify or give oral arguments, I would competently do so.
7. Pursuant to 28 U.S.C. § 1746 and state, I verify under penalty of perjury that the entirety of the foregoing document is true and correct.

Executed on November 10, 2023.

/s/ John Anthony Castro  
John Anthony Castro